

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

CAROLYN McKEOWN,

Plaintiff,

V

PAYCOM PAYROLL, LLC

Defendant.

Case No. 5:24-cv-00301-PRW

Judge: Patrick R. Wyrick

CIVIL ACTION PRO SE

FILED

APR 12 2024

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT WESTERN DIST. OKLA.
BY KB DEPUTY

**EMERGENCY MOTION TO SEAL SENSITIVE INFORMATION, REQUEST FOR
SANCTIONS, AND TO STRIKE DEFAMATORY LANGUAGE**

I, Plaintiff, Carolyn McKeown, respectfully move this Honorable Court to grant the following relief:

1. Issue an order sealing the In Forma Pauperis (IFP) document containing my confidential financial information, which was inadvertently disclosed due to the failure to initially grant my prior motion to seal.
2. Order the Defendant's counsel, McAfee & Taft on behalf of Paycom, to certify in writing that they have permanently destroyed all physical and electronic copies of the IFP document from their records and databases.
3. Prohibit McAfee & Taft from any further use, reference or reliance on the sensitive financial information contained in the IFP, including striking any portions of their Motion to Dismiss that referenced or relied on that information.
4. Render a decision in Plaintiff's favor as a sanction for Defendant's unethical conduct in attempting to gain advantage from the improper disclosure of Plaintiff's confidential IFP data.

5. Reprimand McAfee & Taft for their unethical conduct undermining public trust in confidentiality of court filings, which could deter other litigants' access to the courts.

6. Consider McAfee & Taft's conduct part of a broader pattern by Paycom of disregarding data privacy and protection of sensitive personal information, evidenced by Paycom's known data security issues and data breaches.

As for their unsubstantiated characterization of Plaintiff as "combative" in their filings/motions, Plaintiff refutes this defamatory language through evidence of professional communications.

Plaintiff, as a pro se litigant still seeking employment, requests this unsubstantiated and damaging language be stricken from Defendant's filings/motions. The misconduct at issue represents a severe violation of Plaintiff's rights that necessitates forceful disciplinary actions, evidentiary sanctions, and measures to mitigate further misuse of private-data upholding ethical litigation standards and protecting Plaintiff's rights.

s/ Carolyn McKeown *C. McKeown*

Carolyn McKeown
Carolyn.A.McKeown@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on April, 8, 2024, a true and correct copy of the foregoing was mailed via U.S. mail to the Clerk of Court.

I hereby certify that on April 8, 2024, I emailed the attached document to:

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ATTORNEYS FOR DEFENDANT


s/ Carolyn McKeown

Plaintiff's signature
Carolyn McKeown
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PRO SE PLAINTIFF